



## STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communications Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.

Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier maintains a record of its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.

Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out election are recorded and followed.

Carrier took the following actions against data brokers in 2011, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: NONE

The following is information Carrier has with respect to the process pretexters are using to attempt to access CPNI, and what steps carriers are taking to protect CPNI: Carrier has determined that no pretexter has attempted to access CPNI on Carrier's system.

The following is a summary of all customer complaints received in 2011 regarding the unauthorized disclosure of CPNI:

- Number of customer complaints Carrier received in 2011 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI:  
NONE
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